

**IN THE UNITED STATES COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA,

**Plaintiff,**

**V.**

**NINE FINANCIAL ACCOUNTS, SIX REAL PROPERTIES, AND SIX VEHICLES,**

### Defendant Properties.

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**CIVIL ACTION NO. 4:23-CV-02350**

**AMENDED VERIFIED CLAIM OF SHALONDRIA R. SIMPSON, AS TRUSTEE OF THE SHALONDRIA R. SIMPSON REVOCABLE TRUST**

Shalondria R. Simpson ("Mrs. Simpson"), as Trustee of the Shalondria R. Simpson Revocable Trust (the "Trust"), claimant, files this Amended Verified Claim pursuant to Rule 5(G)(a) of the Supplemental Rules of Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure. As explained below, the Trust claims its interest in the property subject to forfeiture in rem in the above-captioned action (the "Defendant Property") and opposes its forfeiture. The Trust gives notice of its ownership in this property.

1. The claimant making this Amended Verified Claim is Mrs. Simpson, as Trustee of the Trust.
2. The Government filed a Verified Complaint for Civil Forfeiture on June 27, 2023. [Dkt. 1]. That Complaint named nine financial accounts, six real

properties, and six vehicles as Defendants in the above-captioned action, all of which the Government seeks to have forfeited.

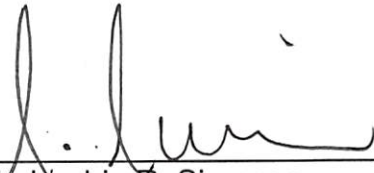
3. The Trust is the sole owner of the real property located at 31 Riverstone Island Dr, Sugarland TX 77479, defendant *in rem* in the above-captioned case.
4. The Trust hereby claims the right to defend this action.
5. The real property located at 31 Riverstone Island Dr, Sugarland TX 77479 has been purchased, funded, or otherwise obtained by legal means.
6. The Trust had no knowledge of the alleged fraudulent conduct. Furthermore, it had no reasonable cause to believe that its assets were or potentially could be subject to forfeiture.
7. This notice of claim is signed by Mrs. Simpson, as Trustee of the Trust, under penalty of perjury, pursuant to Title 28 U.S.C. § 1746.
8. The Trust contests the forfeiture of the claimed property and demands the restoration of any and all of its property rights and the rights to defend this action.

#### **Verification**

I, Shalondria R. Simpson, as Trustee of the Shalondria R. Simpson Revocable Trust, verify and declare under penalty of perjury that I have read this Amended Verified Claim, know its contents, and that the matters contained in it are true and correct to the best of my knowledge.

I verify under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of August, 2023.

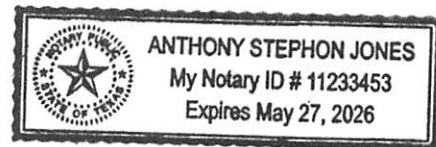
  
\_\_\_\_\_  
Shalondria R. Simpson

State of Texas

County of Harris

Sworn and subscribed before me this 1st day of August, 2023.

  
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Notary Public



Dated: August 1, 2023

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP

BY: /s/ Ryan Meyer  
Ryan J. Meyer

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*Counsel for Shalandria R. Simpson*

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served on all counsel of record through the Court's CM/ECF system on August 1, 2023.

/s/ Ryan J. Meyer  
Ryan J. Meyer